



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

AUG 26 2010

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Scott Farmer, Chief Executive Officer
Cintas Corporation
P.O. Box 625737
Cincinnati, OH 45262

Re: Clean Air Act Reporting Requirement, Docket No. AAA-10-0021

Dear Mr. Farmer:

The United States Environmental Protection Agency ("EPA") is evaluating whether Cintas' New England facilities are in compliance with the Clean Air Act ("the Act") and state and federal regulations promulgated under the Act. These requirements include but are not limited to the federally enforceable sections of the Massachusetts State Implementation Plan ("SIP") regulations at 310 CMR 7.00 et. seq, the State of Rhode Island and Providence Plantations SIP which contains Rhode Island Regulation 9 regarding the permitting of air emission sources, and the Connecticut SIP regulations found at the Regulations of Connecticut State Agencies, Title 22a.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act. This letter requires Cintas to provide specific information about operations at certain of its New England facilities.

Within 60 days of receiving this letter, Cintas is required to provide the following information about each Cintas facility in New England that launders or has laundered towels (unless otherwise specified), including but not limited to those located at: 200 Apollo Drive in Chelmsford, Massachusetts ("the Chelmsford facility"); 300 Highland Corporate Drive in Cumberland, Rhode Island ("the Cumberland facility"); 11 Commercial Street in Branford, Connecticut ("the Branford facility"); and 74 Downing Parkway in Pittsfield, Massachusetts ("the Pittsfield facility"). The term "towels" means shop or print towels of the types used by commercial or industrial businesses to remove oils and/or solvents from machinery and equipment. Where appropriate submit responses in an electronic format consistent with and able to be manipulated by Microsoft Excel. Provide a separate response for each Cintas location.

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1. Provide a list of all facilities in any of the six New England states where Cintas currently operates or have operated in the past five years. Include a brief description of the activities that take place at each facility.
2. Describe each facility's ownership and business structure:
 - a. Indicate the date and state of incorporation;
 - b. List any partners or corporate officers;
 - c. List any parent and subsidiary corporations;
 - d. Provide the number of employees at the facility;
 - e. Provide the net worth of the entity that owns the facility; and
 - f. Provide the date that Cintas began, and if applicable, ceased operations at each facility.
3. Describe the logistics associated with receiving and transporting soiled towels at Cintas' New England facilities. Specifically:
 - a. Indicate whether soiled towels are picked up at individual customer locations exclusively, or whether Cintas uses any drop off centers or other types of collection facilities;
 - b. If drop-off centers or other types of collection facilities are used, specify the location(s) of these facilities;
 - c. Indicate whether pick-ups are scheduled for particular days of the week or take place on an "as needed basis;"
 - d. State how long trucks are typically in transit with each customer's towels;
 - e. Describe how soiled towels are stored within trucks (e.g., whether solely within individual customer bags, or in bags contained within bins, vats, bays or other types of containment); and
 - f. Describe the types of bags provided to customers for storage of their soiled towels. In the description, include the capacity of the bags, the material the bags are made of, and explain whether the bags are designed to separate any liquids contained within the soiled towels.
4. For each facility in New England that launders or has laundered towels, indicate the dates when each facility began, and if applicable, ceased, laundering towels.
5. For each facility in New England that launders towels, describe any factors or limitations that may affect its "potential to emit" of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from the processing of soiled towels. Such factors may include the number and capacity of washers and dryers at the facility.
6. Provide copies of analytical results from any and all emissions testing or internal air monitoring for VOCs or HAPs conducted at any Cintas locations nationwide, including testing results relevant to the development of any facility-specific emission factors.
7. For each facility in New England that launders or has laundered towels, provide the following information for the time period between January 1, 2005 and the present:

- a. The actual quantity (in pounds) of soiled towels received and processed per month and per year. If Cintas distinguishes between categories of towels provided to customers in any way (e.g., print towels, garage towels, auto body towels) please provide the summary of towels processed using such categorization.
 - b. Any and all data describing the VOC content of the soiled towels, including information about the specific solvents or oils contained on the towels;
 - c. Any and all data or calculations of a dirty to clean weight ratio (e.g. 200 pounds of soiled print towels will result in 100 pounds of clean print towels);
 - d. Monthly and annual VOC emissions from towel laundering operations (explain the calculation and any assumptions);
 - e. Records of VOC and/or hydrocarbon content at any point in the wastewater stream;
 - f. Monthly and annual VOC emissions from wastewater pretreatment operations (explain the calculation and any assumptions);
 - g. Any and all instructions provided to customers regarding how they should store their soiled towels and as well as any restrictions on the solvent content of these towels; and
 - h. Specifications of the load cycle times associated with soiled towels, including the typical weight of a load of towels and wash and drying time for each category of soiled towels processed.
8. For each facility in New England that launders or has laundered towels, provide the following information about the washers and dryers used for laundering towels:
 - a. Make, model, capacity and any other operational specifications of each washer and dryer;
 - b. Date of purchase of each washer and dryer;
 - c. Date of installation of each washer and dryer;
 - d. Date that each washer or dryer was put into operation;
 - e. Date that each washer or dryer was taken out of service, if applicable; and
 - f. Indication as to whether the washer or dryer was decommissioned from use at any Cintas location and placed back into service at another Cintas location, including applicable dates of placement and/or removal from service.
 9. For each facility in New England that launders or has laundered towels, list each item of process equipment (e.g. extractors, aeration dryers) and process support equipment (e.g. boilers, compressors) costing above \$10,000 that Cintas has installed since January 1990. Also, for each such piece of equipment, provide the following information:
 - a. The purpose/role of the equipment;
 - b. The cost and date of purchase;
 - c. The date installation was completed;
 - d. The date the equipment began operating; and
 - e. The name of the manufacturer, model number, size, maximum production rate, and any other operational specifications.
 - f. Information pertaining to any emission control devices associated with such process equipment, including the type of emission control device, when such

device was installed, and any data pertaining to emission reductions from use of such device.

10. For each facility in New England that launders or has laundered towels, provide a description of the wastewater treatment process. Provide a diagram of the wastewater treatment operations at each of these facilities and include:
 - a. All tanks used for wastewater storage or treatment (specifying the location of the tank, capacity of the tank in gallons or liters, and the type of treatment occurring in the tank – such as pH adjustment, coagulation/flocculation, etc.);
 - b. Catch basins and trenches used to collect wastewater; and
 - c. Equipment used to extract solvents or other liquids from incoming materials.
11. For each facility in New England that launders or has laundered towels, provide annual VOC emissions since 2005 from:
 - a. All cleaning agents used on-site that contain VOCs;
 - b. All operational solvents and oils used on-site that contain VOC; and
 - c. All fuel burning equipment.Briefly describe how you performed the calculations.
12. During EPA's February 25, 2010 inspection of the Cintas facility in Cumberland, the General Manager, Andrew Careau, indicated that print towels were not processed by Cintas but were shipped to a facility in North Carolina for processing. At an April 8, 2010 EPA inspection of the Branford facility, Cintas personnel indicated that print towels were picked up by Kleentech Industrial Laundry Service of Hickory, North Carolina. Please provide:
 - a. A copy of any written Cintas policy(ies) with respect to acceptance of towels from printers ;
 - b. Copies of written agreement between Cintas and Kleentech;
 - c. Copies of written agreements between Cintas and any other print towel laundering facilities in the United States;
 - d. Copies of invoices and other documentation showing the number of shipments of print towels sent from New England Cintas facilities to Kleentech for the period January 1, 2005 to present.
13. For each year from 2005 through 2009, provide an estimate of the average length of time in days that soiled towels were stored on-site or in trucks locations and at affiliated depot locations. Include copies of supporting information.
14. Provide a list of all Cintas customers that have had towels laundered at New England Cintas facilities since January 1, 2005 Include the client's name, city or town, and state, and the types of towels generated by this customer. Specify:
 - a. The Cintas location where the towels were processed;
 - b. The annual weight of soiled towels generated by each customer;
 - c. The frequency of receipt of towels from each customer, and
 - d. The Standard Industrial Code (SIC code) or North American Industry Classification Code (NAICS code) applicable to each customer.

15. Provide copies of all correspondence Cintas (or any of its predecessors) has had with state and federal environmental agencies regarding air emissions at New England facilities, including copies of:
- a. All permits issued;
 - b. All permit applications; and
 - c. Any requests for permit modifications.

Mail the submissions required by this letter to:

Susan Studlien, Director
Office of Environmental Stewardship
5 Post Office Square, Suite 100, OES04-2
Boston, MA 02109-3912
Attn: Joan Jouzaitis, Air Technical Unit

Be aware that if Cintas does not provide the requested information, EPA may order Cintas to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

Cintas may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Cintas.

If you have any questions regarding this reporting requirement, please contact Joan Jouzaitis, Environmental Engineer at (617) 918-1846 or have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

cc:

Bill Osbahr, EPA, OEME
Robert Girard, CT DEP
Ted Burns, RI DEM
Gregg Hunt, MassDEP, Southeast Regional Office
Saadi Motamedi, MassDEP, Western Regional Office

